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Howie C. Morales
Lt. Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

Certified Mail-Return Receipt Requested

April 15, 2019

The Honorable Mayor Wayne Ake The Village of Bosque Farms 1455 West Bosque Loop Bosque Farms, NM 87068

RE: Village of Bosque Farms; Minor Facility; NPDES Permit No. NM0030379; NPDES Compliance Evaluation Inspection; March 26, 2019

Dear Mayor Ake:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U. S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with the requirements of the federal Clean Water Act.

Further explanations are provided with the check list and discuss issues that should be addressed. The introduction and treatment scheme are also included with this inspection report.

You are encouraged to review the inspection report, required to correct any issues noted during the inspection, and advised to modify your operation and/or administrative procedures as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing USEPA and NMED regarding modifications and compliance schedules at the address below:

Village of Bosque Farms April 15, 2019 Page -2-

David Long, NPDES Enforcement Coordinator Environmental Protection Agency, Region 6 NPDES Enforcement Branch (6EN-WM 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733 Sarah Holcomb, Program Manager New Mexico Environment Dept. Surface Water Quality Bureau Point Source Regulation Section PO Box 5469 Santa Fe, New Mexico 87502

David Long (<u>Long.David@epa.gov</u>) is USEPA Region 6's NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Sandra Gabaldon at 505-827-1041 or <u>Sandra.gabaldon@state.nm.us</u>

Sincerely,

Sarah Holcomb, Program Manager Point Source Regulation Section Surface Water Quality Bureau

Cc: Carol Peters-Wagnon, USEPA (6EN-WM via email David Long, USEPA (6EN-WM) via email Nancy Williams, USEPA (6EN-WC) via email Amy Andrews, USEPA (6EN-WM) via email David Esparza, USEPA (6EN-WM) via email Brent Larson, USEPA (6WQ-PP) via email

Kevin Fryhover, Utility Director via email

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85



NPDES Compliance Inspection Report

	Section A: National Data System Coding																															
	Transaction Code NPDES yr/mo/day Inspec. Type Inspector Fac Type																															
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67 1 69 70 3 71 N 72 N 73 74 75									75							80)															
															5	ection	n B: Fa	cility	Data													
POTV BOSO Farm very	Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) BOSQUE FARMS WWTP – From 1-25 South, Exit Broadway Blvd/NM4 and continue to Bosque Farms. Turn west on South Bosque Loop. Turn south at McNew Road (where S. Bosque Loop has a very sharp turn). Then to Desmet Road. WWTP can be seen from the road (at end of Desmet Road). VALENCIA COUNTY Entry Time /Date 0942 Hours / March 26, 2019 Exit Time/Date 1240 Hours / March 26, 2019																															
Nam	e(s) c	f On-	Site	Rep	rese	ntati	ve(s)/1	itle(s)	/Ph	one	and I	Fax Nu	mber	(s)											Oth	Apri er Fac		2023 Data				
Denr	is Ch	avez,	Cer	ified	І Ор	erato	r, Lev	el II / (505) 91	7-218	85													SIC	4952						
The I 1455	Name, Address of Responsible Official/Title/Phone and Fax Number The Honorable Mayor Wayne Ake / (505) 869-2357 1455 West Bosque Loop Bosque Farms, NM 87068 Yes 39.83944 N -106.710833 S																															
	Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)																															
s	Peri	nit							S	Flo		leasur					S	Т	eration						N	cso/sso						
М	Red	ords	/Rep	orts					S	s	elf-N	lonito	ring P	rogra	m		U	Slu	udge H	andlin	g/Disp	osal			N	Pollution Prevention						
s	Fac	ility S	ite I	Revie	ew				N	C	ompl	iance Schedules					N	Pretreatment N					N	Multimedia								
S	Effl	uent	/Rec	eivir	ıg W	/aters	5	1	М	La	bora	tory					N	St	orm W	ater					N	Other:						
										Se	ction	n D: Su	mma	ry of I	Finding	s/Con	nment	s (Att	ach ad	dition	al she	ets if r	necess	ary)								
	1. Please see checklist and further explanations sections.																															
Nam	e(s)	and S	igna	ture	(s) o	f Ins	ector	(s)						Ag	Agency/Office/Telephone/Fax										Date							
Sand	Sandra Gabaldón								NMED/SWQB/(505) 827-1041/(505) 827-0617									April 15, 2019														
Signature of Management QA Reviewer						1	•				Fax Nu							Date														
Saral	Sarah Holcomb, Program Manager							NN	NMED/SWQB/(505) 827-2798/(505) 827-0617								April 15, 2019															

Village of Bosque Farms	PERMIT NO. NM0030279
SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS MS MU U NA (FURTHER E. DETAILS:	XPLANATION ATTACHED <u>NO</u>)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	⊠ y □ n □ na
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	□ y □ n ⊠ na
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	⊠ y □ n □ na
4. ALL DISCHARGES ARE PERMITTED	⊠ y □ n □ na
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. \square S \boxtimes M \square U \square NA (Further EDETAILS:	EXPLANATION ATTACHED <u>YES</u>)
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	$\square_{\mathrm{Y}} \boxtimes_{\mathrm{N}} \square_{\mathrm{NA}}$
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	□s ⋈ m □ u □ na
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	⊠ y □ n □ na
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	⊠ y □ n □ na
c) ANALYTICAL METHODS AND TECHNIQUES.	⊠ y □ n □ na
d) RESULTS OF ANALYSES AND CALIBRATIONS.	⊠ y □ n □ na
e) DATES AND TIMES OF ANALYSES.	⊠ y □ n □ na
f) NAME OF PERSON(S) PERFORMING ANALYSES.	□ y ⊠ n □ na
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	⊠s □m □u □na
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	⊠s □m □u □na
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	□ y ⋈ n □ na
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. S M U NA (FURTHER E	EXPLANATION ATTACHED <u>NO</u>)
1. TREATMENT UNITS PROPERLY OPERATED.	⊠s □m □u □na
2. TREATMENT UNITS PROPERLY MAINTAINED.	⊠s □m □u □na
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	⊠s □ m □ u □ na
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	⊠s □m □u □na
5. ALL NEEDED TREATMENT UNITS IN SERVICE	⊠s □ m □ u □ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	⊠s □m □u □na
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	⊠s □ m □ u □ na
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	⊠Y□N□NA ⊠Y□N□NA □Y⊠N□NA

Village of Bosque Farms	PERMIT NO. NM0030279
SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)	
9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	□ y ⊠ n □ na □ y □ n ⊠ na □y □ n ⊠ na
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	□ y ⊠ n □ na □ y □ n ⊠ na
SECTION D - SELF-MONITORING	
PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXP.) DETAILS:	PLANATION ATTACHED <u>NO</u>).
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	⊠ y □ n □ na
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	⊠y□n□na
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	⊠ y □ n □ na
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	⊠ y □ n □ na
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	□y ⊠ n □ na
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	⊠y □n □na
a) SAMPLES REFRIGERATED DURING COMPOSITING.	⊠ y □ n □ na
b) PROPER PRESERVATION TECHNIQUES USED.	⊠y□n □na
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	⊠y□n □na
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	□ y □ n ⊠ na
SECTION E - FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.	LANATION ATTACHED <u>NO</u>)
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE <u>: 6 inch Parshall flume</u>	⊠y □ n □ na
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	⊠y □n □na
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	⊠y □n □na
4. CALIBRATION FREQUENCY ADEQUATE. RECORDS MAINTAINED OF CALIBRATION PROCEDURES. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	⊠y□n□na ⊠y□n□na ⊠y□n□na
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	⊠y□n□na
6. HEAD MEASURED AT PROPER LOCATION.	⊠y □n □na
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	⊠ y □ n □ na
SECTION F – LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. □ S ⋈ M □ U □ NA (FURTHER EXP.) DETAILS:	LANATION ATTACHED <u>YES</u>
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)	⊠ y □ n □ na

		Village of Bo	osque Farms			PERMIT NO: NM	10030279					
SECTION F - LABO	RATORY (CONT'D)											
2. IF ALTERNATIVE AN	JALYTICAL PROCEDUF	RES ARE USED, PROPE	R APPROVAL HAS BEE	EN OBTAINED			NA					
3. SATISFACTORY CAI	2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED LY LN MA 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S D M L U LNA											
4. QUALITY CONTROL	PROCEDURES ADEQU	АТЕ.				s ⊠ m □ u □ n	JA.					
5. DUPLICATE SAMPLE	ES ARE ANALYZED. <u>0</u>	_ % OF THE TIME.					NA					
6. SPIKED SAMPLES AI	RE ANALYZED % O	F THE TIME.					NA					
7. COMMERCIAL LABO	DRATORY USED.					⊠y □n □1	NA					
LAB NAME	Hall Er	nvironmental Analysis Lab	oratory, Inc.	Bio	Aquatic Testing, Inc							
LAB ADDRESS	4901 H	awkins, NE; Albuquerque	, New Mexico 87109	250	1 Mayes road; Suite 100; C	Carrollton, TX 75006						
PARAMETERS PERFO	DRMED E.coli;	TSS, BOD		Bio	monitoring (WET)							
SECTION G - EFI	FLUENT/RECEIVIN	G WATERS OBSER	VATIONS.	s □ m □ u □ NA	A (FURTHER EXPLANATION	I ATTACHED).	Г					
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER					
001	None	None	None	None	None	Clear						
RECEIVING WATER	RECEIVING WATER OBSERVATIONS											
SECTION H - SLUI	DGE DISPOSAL											
SLUDGE DISPOSAL DETAILS:	MEETS PERMIT REQUI	REMENTS.		s □ m 図 u □ NA	(FURTHER EXPLANATION	ATTACHED <u>YES</u>).						
1. SLUDGE MANAGI	EMENT ADEQUATE TO	MAINTAIN EFFLUENT	QUALITY.			⊠ s □ m □ u □	l na					
	S MAINTAINED AS RE					□s □ м ⊠ u □						
	ED SLUDGE, TYPE OF I			GRICULTURAL, PUBLI								
SECTION I - SAM	IPLING INSPECTIO	N PROCEDURES	(FURTHER EXPLANATION	ATTACHED).								
1. SAMPLES OBTAIN	NED THIS INSPECTION.					□ y □ n Þ	NA NA					
2. TYPE OF SAMPLE OBTAINED												
GRAB COMPOSITE SAMPLE METHOD FREQUENCY												
3. SAMPLES PRESERVED. □ Y □ N □ NA												
4. FLOW PROPORTION	4. FLOW PROPORTIONED SAMPLES OBTAINED.											
5. SAMPLE OBTAINI	5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.											
6. SAMPLE REPRESE	ENTATIVE OF VOLUME	E AND MATURE OF DIS	CHARGE.			\square Y \square N \square	□ NA					
7. SAMPLE SPLIT W	ITH PERMITTEE.					\square Y \square N \square] NA					
8. CHAIN-OF-CUSTO	DDY PROCEDURES EMI	PLOYED.] na					
9. SAMPLES COLLEG	CTED IN ACCORDANCE	E WITH PERMIT.		9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.								

VILLAGE OF BOSQUE FARMS NPDES Permit No. NM0030279 NPDES Compliance Evaluation Inspection

Date of Inspection: March 26, 2019

Introduction:

On March 27, 2019, Sandra Gabaldón and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Village of Bosque Farms Wastewater Treatment Plant (WWTP). The Village of Bosque Farms WWTP has a design flow capacity of 0.5 MGD (million gallons per day) and is classified as a minor discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030279. This permit regulates the WWTP discharge to Rio Grande in segment 20.6.4.105 NMAC (State of New Mexico Standards for Interstate and Intrastate Surface Waters) of the Rio Grande Basin. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WWTP at 0942 hours on March 27, 2019, Ms. Gabaldón conducted an entrance interview with Mr. David Chavez, Operator. Ms. Gabaldón presented her credentials and explained the purpose of the inspection. Mr. Chavez conducted a tour of the facility. An exit interview was conducted with Messrs. Chavez and Kevin Fryhover, Utility Director at the facility at approximately 1240 hours on March 27, 2019 to present the preliminary findings of the inspection. The WWTP provided benchsheets, flow documentation and calibration for all parameters either done by the permittee or a contract laboratory.

Treatment Scheme:

Bosque Farms WWTP has a design capacity of 0.5 MGD. Recently, the neighboring Village of Peralta has begun discharging to the WWTP.

The Village of Bosque Farms currently has an ordinance in place that requires installation, maintenance and inspection of grinder pumps, grease traps, and sand traps. Sand traps are required for car washes, schools, day care facilities, commercial laundries and the laundromats. Grinder pumps are connected to each residence as well as commercial facilities throughout the village. Each grinder pump is equipped with an alarm system which alarms when something is wrong with the unit. Every resident is taught about the alarm system and the need to call immediately. The Village WWTP staff provide maintenance and necessary repairs of the grinder pumps when needed. The grinder pumps serve as the headworks for the facility by grinding large debris prior to entering the facility.

Influent enters the facility at the aeration basin. The aeration basin is aerated using diffused air in the bottom of the tank from one of three alternated blowers. The aeration basin has concrete baffles to extend the aeration time and surrounds the secondary clarifier. A scum skimmer arm removes floatables from the clarifier and places them into the scum pit that eventually goes to the sludge storage basin.

Ultraviolet (UV) light is used for disinfection. Two banks with four lights each can be alternated for maintenance. The UV system is cleaned with an automatic wiper system. Chlorine has not been used either in process control or in disinfection. Immediately after the UV system, effluent flow is measured using a 6-inch Parshall flume and a secondary Drexelbrook ultrasonic flow meter.

Solids Management:

Waste sludge is pumped from the secondary clarifier to an aerated thickener unit. The sludge is thickened with a polymer and allowed to settle by turning off aeration. Records kept at the WWTP indicate that solids reach a concentration between 2 to 3 percent before being trucked to a village-owned 240 acre fenced unlined sludge disposal facility located on an access road from Dallies Road, three miles south of NM 6 in Valencia County. Final disposal is achieved with surface disposal using an injection truck and injecting the waste into the ground approximately six inches.

Sludge is also sent to the Flo Trend®Sludge Mate for further dewatering and is then sent to the landfill in Rio Rancho, New Mexico for final disposal.

VILLAGE OF BOSQUE FARMS WWTP

NPDES Permit No. NM0030279

NPDES Compliance Evaluation Inspection
Date of Inspection: March 27, 2019

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

Section B - Recordkeeping and Reporting Evaluation - Overall Rating of "Marginal"

Part III.C.4 of the Permit states:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurement;
- b. The individual(s) who performed the sampling event;
- c. The date(s) and time(s) analysis was performed;
- d. The individual(s) who performed the analysis;
- e. The analytical or technique used; and
- f. The results of such analysis.

Part I.E Pollution Prevention Requirements of the Permit:

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

- a. The influent loadings, flow and design capacity;
- b. The effluent quality and plant performance;
- c. The age and expected life of the wastewater treatment facility's equipment;
- d. Bypasses and overflows of the tributary sewerage system and treatment works;
- e. New developments at the facility;
- f. Operator certification and training plans and status;
- g. The financial status of the facility;
- h. Preventive maintenance programs and equipment conditions and;
- i. An overall evaluation of conditions at the facility.

The EPA NPDES Reporting Requirements Handbook, Revised August 25, 2004 states:

Reporting of Loadings:

Some parameters in the permit are limited in terms of pounds per day (lbs/d). Although all these parameters are measured initially in milligrams per liter (mg/L), conversion to lbs/d can e achieved by using the following formula. <u>ALWAYS BE SURE TO USE THE FLOW MEASUREMENT</u> <u>DETERMINED ON THE DAY WHEN THE SAMPLING WAS DONE.</u>

Flow on the day of sampling (MGD) X concentration (mg/L) X 8.34 (lbs/d) = Loading

<u>Findings</u> for Recordkeeping and Reporting:

The permittee does not provide the name of the individual who performed the analysis (pH bench sheets).

The permittee has not developed a <u>Pollution Prevention Plan</u>. The Pollution Prevention Act of 1990 established pollution prevention as a preferred means of pollution control and presented a hierarchy of pollution control measures. EPA Region 6 developed a policy to support the Act in NPDES permit activities and included specific elements into Part I of the permit language as stated above.

It is unclear to NMED what mathematical equation the permittee is using to determine their 7-day average and 30-day average loading for BOD and TSS. However, NMED believes that the flow from the day of sampling is not being used for their calculations.

NMED provides the following results for BOD, TSS loading for the month of November as an example of the discrepancies seen on all reviewed DMRs (November 2018, December 2018, January 2019)

November 2018:

Parameter	30-day		30-day	Ave	7-day Av		7-Day Avg		
	Loadin	g	Concer	ntration	Concent	ration	Loading		
	DMR	Check	DMR	Check	DMR	Check	DMR	Check	
BOD	6.6	5.45	3.5	3.5	5.0	5.0	9.63	7.80	
TSS	7.54	6.22	4.0	4.0	4.0	4.0	7.71	6.24	

Sample Date:	Daily Flow (MGD)	BOD (mg/l)	Calculated Daily Load
11/07/2018	.187	5.0	.187 X 5.0 X 8.34 = 7.80
11/20/2018	.186	2.0	.186 X 2.0 X 8.34 = 3.10
Calculated Monthly	7.80 + 3.10 / 2 = 5.45		
Average:			
Reported on DMR	6.6		

Sample Date:	Daily Flow (MGD)	TSS (mg/l)	Calculated Daily Load
11/07/2018	.187	4.0	.187 X 4.0 X8.34 = 6.24
11/20/2018	.186	4.0	.186 X4.0 X 8.34 = 6.20
Calculated Monthly	6.24 + 6.20 / 2 = 6.22		
Average:			
Reported on DMR	7.54		

<u>Section D – Self-Monitoring – Overall rating of "Marginal"</u>

Part I. Section A. Limitations and Monitoring Requirements states:

EFFLUENT	DISCHARGE LIMIT	ATIONS	MONITORING REQUIREMENTS			
CHARACTERISTICS	STANDARD UNITS					
POLLUTANT	MINIMUM	MAXIMUM	MEASUREMENT	SAMPLE TYPE		
			OF FREQUENCY			
рН	6.6	9.0	5/week	Grab		

<u>Findings</u> – for Self-Monitoring:

The permittee provided bench sheets for pH beginning in 2018 and through March 2019. One sample taken each month. The permittee is required to sample pH five (5) times a week.

<u>Section F – Laboratory – Overall Rating of "Marginal"</u>

In Part C.5. Monitoring Procedures of the Permit it states:

- a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.
- b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.
- c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes and *duplicate samples* to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Findings for Laboratory:

The purpose of laboratory control procedures is to ensure high-quality analyses using control samples, control charts, reference materials, and instrument calibration. The laboratory must initiate and maintain controls throughout the analysis of samples. Specifically, each testing batch must contain at least one blank, standard, duplicate, and spiked (as applicable) sample analysis. When a batch contains more than 10 samples, every tenth sample should be followed by a duplicate and a spike (as applicable).

The permittee does not do duplicate samples. This should be done at least 10% of samples.

<u>Section H – Sludge Disposal – Overall Rating "Unsatisfactory"</u>

40 CFR § 503.27 – Recordkeeping (Surface Disposal) requires:

- (a) When sewage sludge (other than domestic septage) is placed on an active sewage sludge unit:
- (1) The person who prepares the sewage sludge shall develop the following information and shall retain the information for **five years**.
- (i) The concentration of each pollutant listed in Table 1 of § 503.23 in the sewage sludge when the pollutant concentrations in Table 1 of § 503.23 are met.
- (iii) A description of how the pathogen requirements in § 503.32 (a), (b)(2), (b)(3), or (b)(4) are met when one of those requirements is met.
- (iv) A description of how one of the vector attraction reduction requirements in § 503.33 (b)(1) through (b)(8) is met when one of those requirements is met.

<u>Findings</u> for Sludge Disposal:

The permittee was unaware of the requirements for surface disposal under 40 CFR §503 regulations. They have not been following the requirements of Part IV of the Permit. The permittee should follow page 12 (Requirements applying to all sewage sludge surface disposal and page 16 (Requirements specific to surface disposal sites without a liner and leachate collection system).